

**IN THE UNITED STATES DISTRICT
FOR THE WESTERN DISTRICT OF
OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,)	
)	
Petitioner/Judgment Creditor)	
)	
vs.)	
)	
AVON CAPITAL, LLC,)	
)	
Respondent/Judgment Debtor,)	
)	
ASSET SERVICING GROUP, LLC,)	
)	
Respondent, Garnishee,)	Case No. 14-FJ-05-HE
)	
SDM HOLDINGS, LLC,)	
)	
Respondent/Garnishee,)	
)	
and)	
)	
AVON CAPITAL, LLC, a Wyoming Limited)	
Liability Company,)	
)	
Intervenor.)	

**PLAINTIFF UNIVERSITAS EDUCATION, LLC’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY BRIEF**

Pursuant to Local Civil Rule 7.1(h) and this Court’s inherent power to manage its affairs, Plaintiff Universitas Education, LLC (“Universitas”) hereby files this Motion for Extension of Time to File Reply Brief in Further Support of its Motion to Modify Injunction, (Doc. No. 586), (the “Motion”). In support of its Motion, Universitas states as follows:

Universitas filed its Emergency Motion to Modify Injunction on February 2, 2024. Avon Capital, LLC, a Wyoming limited liability company, and interested party Phoenix Charitable Trust, filed Oppositions to the Motion to Modify Injunction on March 5, 2024. Currently, Universitas's reply brief is due on March 12, 2024. LCvR7.1(i) (providing seven (7) days to file a reply brief after a response is filed). No previous extensions have been requested for filing a reply. Universitas is respectfully requesting a brief extension until March 22, 2024 to file its reply because counsel for Universitas responsible for much of the day-to-day motions practice in the instant case has long-standing international travel plans between March 11, 2024 and March 19, 2024. A reply brief is necessary in this case because intervening factual circumstances since Universitas's filing of its Motion to Modify Injunction have arisen that have a bearing on the relief sought. Universitas has conferred with counsel for Avon-Wyoming and Phoenix Charitable Trust, and neither party opposes Universitas's requested relief for an extension of time until March 22, 2024 to file. This brief extension will have no impact on the other proceedings in this matter.

WHEREFORE, Plaintiff Universitas Education, LLC respectfully requests that this Court grant its Motion for Extension of Time to File Reply Brief.

Dated: March 11, 2024

Respectfully submitted,

/S/ Joseph L. Manson III
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ATTORNEYS FOR PLAINTIFF
UNIVERSITAS EDUCATION, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and to all counsel of record.

/s/ Joseph L. Manson III